

# Ecological Impact Assessment

**Former General Hospital Merthyr**

**July 2023**

Ecology | Green Space | Community | GIS

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**Report Produced for Signature Realtors Ltd**

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## SUMMARY

<b>Purpose of the Report</b>	This Report has been produced by Ethos Environmental Planning on behalf of Signature Realtors Ltd. It provides an assessment of the likely ecological effects associated with the proposed renovation project of the 'Former General Hospital Merthyr.'
<b>Description of the scheme</b>	The development proposals for the site are for the demolition of part of the existing structure and development of residential properties.
<b>Methodology</b>	A structures inspection and emergence survey for bats were undertaken for the site in May 2023.
<b>Baseline Ecological Conditions</b>	<ul style="list-style-type: none"> <li>• The site comprised a former hospital building, in an advanced state of disrepair with surrounding hardstanding.</li> <li>• The structure had low potential for bats, based on the previous surveys assessment by Just Mammals Consultancy (2016) and the advanced state of dereliction seen in 2023, with otherwise suitable features exposed to the elements.</li> <li>• There were no bats identified emerging from the structure and only one species of bat was identified using the site during the survey, namely common pipistrelle.</li> <li>• Breeding bird activity was seen on the site; with both robin and feral pigeon observed exhibiting breeding behaviours.</li> </ul>
<b>Mitigation and Enhancements</b>	<ul style="list-style-type: none"> <li>• To safeguard breeding birds, precautionary consideration during construction is recommended by carrying out pre-works checks of structures to be impacted.</li> <li>• The building does not currently support a bat roost, however precautionary mitigation has been recommended during construction works to ensure bats are safeguarded throughout this phase of the project.</li> <li>• New bat boxes and bird boxes could be provided on the building to provide enhancements to bats and birds.</li> </ul>
<b>Conclusion</b>	<ul style="list-style-type: none"> <li>• Assuming the implementation of effective mitigation measures, as set out in this report, no significant adverse ecological effects are predicted.</li> <li>• The proposed development is therefore in accordance with relevant national and local planning policies in relation to nature conservation and relevant wildlife legislation.</li> </ul>



# 1 INTRODUCTION

- 1.1 This Ecological Impact Assessment (EclA) report has been prepared by Ethos Environmental Planning (Ethos) on behalf of Signature Realtors Ltd. The EclA was written by Kate Downes MSc BSc (Hons), Assistant Ecologist, and reviewed by Stephanie Green MSc BSc (Hons), Principal Ecologist at Ethos. The details and experience of the authors and field survey team are provided in Section 3.7.
- 1.2 The report provides the results of an EclA in relation to the proposed development of the Former General Hospital Merthyr (Central Grid Reference SO 052069), hereafter referred to as ‘the site’ and shown in Figure 1.
- 1.3 The development site comprises 0.24 hectares and contains one main structures, a former hospital building now in advanced disrepair.



Figure 1 Site location

- 1.4 The proposals for the site are for the redevelopment of the existing structure; with part demolition and retention of sections to be incorporated into the design of residential properties.
- 1.5 Surveys carried out by Just Mammals Consultancy (2016) and their survey report is referred to within this assessment, where they add to evidence gathered during Ethos’ 2023 surveys.

1.6 The aims of this EclA report are to:

- provide an assessment of the likely effects of the proposed development on ecological features on site;
- identify the measures required to mitigate impacts on site biodiversity;
- identify opportunities to deliver ecological enhancements and measurable gains for biodiversity as part of the development proposals;
- to enable the Local Planning Authority to assess whether the proposals comply with relevant planning policy or legislation.

1.7 This report has been produced following the approach set out in CIEEM's 'Guidelines for Ecological Report Writing' (CIEEM, 2017).

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## 2 POLICY AND LEGISLATION

### 2.1 National Policy

2.1.1 National Policy in relation to biodiversity in Wales is set out in Section 6.4 Biodiversity and Ecological Networks in Planning Policy Wales Edition 11 (February 2021). The policy is focused around the requirement for development plan strategies, policies and development proposals to consider the need to:

- support the conservation of biodiversity, in particular the conservation of wildlife and habitats;
- ensure action in Wales contributes to meeting international responsibilities and obligations for biodiversity and habitats;
- ensure statutorily and non-statutorily designated sites are properly protected and managed;
- safeguard protected and priority species and existing biodiversity assets from impacts which directly affect their nature conservation interests and compromise the resilience of ecological networks and the components which underpin them, such as water and soil, including peat; and
- secure enhancement of and improvements to ecosystem resilience by improving diversity, condition, extent and connectivity of ecological networks.

### 2.2 Local Policy

2.2.1 Merthyr Tydfil County Borough Council adopted the **Replacement Local Development Plan (LDP) 2016-2031** in January 2020. It supersedes and replaces the adopted Merthyr Tydfil County Borough Council Local Development Plan (LDP) 2006-2021. The following policies relate to nature conservation and development:

#### Policy EnW1: Nature Conservation and Ecosystem Resilience

*Development proposals will be required to promote the resilience of ecosystems. In particular, proposals will be required to maintain and enhance biodiversity interests unless it can be demonstrated that:*

- 1) *The need for the development clearly outweighs the biodiversity value of the site; and*
- 2) *The impacts of the development can be satisfactorily mitigated and acceptably managed through future management regimes.*

#### Policy EnW2: Internationally and Nationally Protected Sites and Species

*Development proposals likely to affect protected species will only be permitted where it is demonstrated that:*

- 1) *The population size, range, distribution and long-term prospects of the species will not be significantly adversely impacted;*
- 2) *There is no suitable alternative to the proposed development;*
- 3) *The benefits of the development clearly outweigh the adverse impacts on the protected species; and*
- 4) *Appropriate, avoidance, minimisation, mitigation, compensation and enhancement measures are provided.*

Policy EnW3: Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species

*Development proposals likely to have an adverse impact on Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves, or Priority Habitats and Species will only be permitted where it can be demonstrated that:*

- 1) *The need for the development clearly outweighs the conservation value of the site;*
- 2) *Adverse impacts on nature conservation features or geological features can be avoided;*
- 3) *Appropriate and proportionate mitigation and compensation measures can be provided; and*
- 4) *The development maintains and where possible enhances biodiversity and geodiversity interests.*

Policy EnW4: Environmental Protection

*Development proposals will be required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment from either:*

- *Pollution of land, surface water, ground water and the air;*
- *Land contamination;*
- *Hazardous substances;*
- *Land stability;*
- *Noise, vibration, dust, odour nuisance and light pollution; or*
- *Any other identified risk to public health and safety.*

*Where impacts are identified the Council will require applicants to demonstrate that appropriate measures have been incorporated to reduce, or minimise the impact identified to the lowest possible acceptable level. Planning conditions may be imposed or legal obligation entered into, to secure any necessary mitigation and monitoring processes.*

- 2.2.2 The **Merthyr Tydfil County Borough Council Nature Recovery Action Plan (2019-2014)** replaces the previous Merthyr Tydfil Biodiversity Action Plan (2014-2019), and represents the S6 plan for Merthyr Tydfil County Borough, in accordance with Welsh Government Guidance: 'Environment (Wales) Act 2016 Part 1: Guidance for Section 6 –



The Biodiversity and Resilience of Ecosystems Duty'. The objectives relating to development are as follows:

- 1) *Engage and support participation and understanding to embed biodiversity throughout decision-making at all levels.*
- 2) *Safeguard species and habitats of principal importance and improve their management.*
- 3) *Increase the resilience of our natural environment by restoring degraded habitats and habitat creation.*
- 4) *Tackle key pressures on species and habitats.*

## 2.3 Relevant Legislation

2.3.1 The following pieces of legislation have been considered within this assessment with an explanation of their relevance provided.

Legislation	Relevance
<p><b>The Habitats Directive</b> (together with the Birds Directive) forms the cornerstone of Europe's nature conservation policy. It is built around two pillars: the Natura 2000 network of protected sites and the strict system of species protection. All in all, the Directive protects over 1,000 animals and plant species and over 200 "habitat types" (e.g. special types of forests, meadows, wetlands, etc.), which are of European importance. The Habitats Directive and parts of the Birds Directive are transposed into legislation by <b>The Conservation of Species and Habitat Regulations 2017 (as amended)</b>.</p>	<p>Presence of foraging bats onsite.</p>
<p><b>Wildlife and Countryside Act 1981</b> (as amended, including by the Countryside and Rights of Way Act 2000), which provides legislative protection for certain species. The Act also prohibits the spread of invasive plant species, as well as providing the mechanism for the designation and protection of Sites of Special Scientific Interest;</p>	<p>Presence of breeding birds in structures.</p>
<p>The <b>Environment (Wales) Act 2016</b> introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty). This duty applies to public authorities in the exercise of their functions in relation to Wales and will help maximise contributions to achieving the well-being goals. The Nature Recovery Action Plan supports this legislative requirement to reverse the decline in biodiversity, address the underlying causes of biodiversity loss by putting nature at the heart of decision-making and increasing the resilience of ecosystems by taking specific action focused around the objectives for habitats and species.</p>	<p>Enhancements for biodiversity.</p>

## 3 METHODOLOGY

### 3.1 Scope of Assessment

3.1.1 This assessment has been undertaken following the approach set out in the ‘*Guidelines for Ecological Impact Assessment in the UK and Ireland*’ (CIEEM, 2018). The assessment has considered ‘Important Ecological Features’ that are present within the ‘Zone of Influence’ of the project. Important Ecological Features for this project comprise<sup>1</sup>:

- Designated nature conservation sites;
- Habitats and Species of Principal Importance for the Conservation of Biodiversity in England;
- Legally protected species; and
- Red Listed or rare species (based on Red Data Book lists, Birds of Conservation Concern and species considered to be nationally rare / scarce).

3.1.2 The Zone of Influence (Zoi) is the area over which the project could have an influence on ecological features. The Zoi is likely to vary for different features. However, in general terms the Zoi for this development proposal is considered to comprise the land within the red line boundary as well as immediate adjacent habitat features. It also includes designated nature conservation sites in the surrounding area.

3.1.3 The scope of the assessment was informed by an ‘ecological walkover’ undertaken in May 2023. The purpose of this was to identify the habitats on site, their potential for protected species and to establish the scope of surveys that would be required to inform a future planning application at the site.

3.1.4 The overall assessment has been informed by guidelines provided in CIEEM (2017) Guidelines for Ecological Report Writing.

### 3.2 Background Data Search

3.2.1 A background data search was not requested from the South East Wales Biodiversity Records Centre (SEWBReC) as this was considered disproportionate to the small scale of the site proposed for development and the potential for the site to support protected and notable species.

3.2.2 A search for statutory designated sites within 2km of the development site and granted European Protected Species (EPS) licences within 1km of the site boundary was undertaken using publicly available information (DEFRA Magic map).

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<sup>1</sup> Box 14 in CIEEM’s ECiA Guidelines (2018)

### **3.3 Bat Surveys**

#### Habitats assessment

- 3.3.1 The habitats on site were assessed for their suitability to support foraging and commuting bats. This assessment was also contextualised through examination of suitable habitat and ecological features in the wider landscape and possible wildlife corridors across the proposed site following natural linear features such as hedgerows.

#### Preliminary roost inspection

- 3.3.2 A physical external inspection of all buildings on site were undertaken. The physical search includes a search for live animals and a search for other signs that give an indication of past or present occupancy as outlined below. In the case of bats, typical indicators include droppings (which are characteristic and can often be speciated or at least be indicative of species type), signs of staining, urine splashing, characteristic odours, and accumulations of discarded prey remains. An internal inspection was not undertaken due to safety concerns; see Section 3.5.
- 3.3.3 The search included the use of binoculars to investigate potential bat roost features.

#### Emergence survey

- 3.3.1 One emergence survey was undertaken on the structure on 10<sup>th</sup> May 2023.
- 3.3.2 The emergence survey commenced 15 minutes before sunset and finished approximately an hour and a half after sunset.
- 3.3.3 Four surveyors were positioned to view all aspects of the structure during the survey, located in positions adjacent to potential roosting features. Positions are shown in Figure 2 below.
- 3.3.4 Echo Meter Touch (EMT) bat detectors were used for the survey. All calls recorded were analysed using the Echo Meter Touch app software. All calls recorded were cross referenced to a call reference collection library of known bat species to confirm species presence.



Figure 2 Location of surveyors during emergence survey

### 3.4 Bird Survey

- 3.4.1 The bird survey included an assessment of the habitats on site for their potential to support protected and notable species of bird as well as their potential to support breeding birds.
- 3.4.2 The externals of the building were inspected for evidence of nesting birds during the structure inspection.

### 3.5 Limitations

- 3.5.1 A desk study was not requested from the local records centre as part of the EclA, however based on the assessment of the scope of works on the development site, combined with the features to be impacted and their potential for protected and notable species, this was assessed to be proportionate and not judged to be a significant limitation to the assessment.

- 3.5.2 Additional emergence surveys were not undertaken due to the safety of surveyors during the surveys. To view the structure fully, the surveyors had to be positioned on the street in potentially vulnerable locations due to interactions with local residents. Undertaking a single emergence survey was not considered to be a significant limitation of the assessment due to the low levels of bat activity recorded whilst surveying and the advanced state of disrepair the structure was in; making good roosting features limited and therefore, resulting in the building being assessed to contain 'low' potential for bats. Additionally, three surveys have been undertaken previously by Just Mammals Consultancy (2016), which did not identify the presence of roosting bats.
- 3.5.3 Internal access into the structure on site was not possible at the time of survey due to the advanced state of dereliction. It was not safe to enter the structure, as such the building was assessed from the externals only. The externals of the structure were assessed from a distance, using binoculars where necessary, due to a safety perimeter around the structure limiting access. The same potential features were identified as highlighted in the previous surveys (Just Mammals Consultancy, 2016) and assessed to be unsuitable. Furthermore, the features have been exposed to further degradation and exposure to the elements, making them more unsuitable for bats and so this is not considered to be a significant limitation of the assessment.
- 3.5.4 Overall, the data gathered is therefore considered sufficient to make a robust assessment of bat presence.

## 3.6 Evaluation of Ecological Features

- 3.6.1 In line with CIEEMs guidelines on EclA, this assessment has focused on relevant Important Ecological Features. The scale of importance of these features has been determined based on available contextual information, which for this project are considered to include:
- **International** – of internationally and protected through international legislation;
  - **National** – of importance in Wales and protected through national legislation;
  - **County** – of importance to the county (Mid Glamorgan) but not sufficiently important to warrant 'National' scale of importance; and
  - **Local** – of importance to the local area (Merthyr Tydfil), but not sufficiently important to warrant County scale of importance.
- 3.6.2 Potential impacts on Important Ecological Features are identified and assessed; likely significant effects are those likely to result in a change to the conservation status of a habitat or species population or undermine/support nature conservation policy. Mitigation measures have been devised following the mitigation hierarchy; appropriate mechanisms for securing mitigation measures have been identified.



### 3.7 Personnel

3.7.1 The surveyors on site have been detailed below in Table 1.

Table 1 Site surveyors

Ecologist	Position	Qualifications/ Licences	Experience	Surveyor Activities
<b>Kane Burchill</b>	Senior Ecologist	<p>Level 2 Certificate and Diploma in Work-based Environmental Conservation</p> <p>Tree Climbing and Rescue, City and Guilds NPTC Level 2 Award (206 and 306)</p> <p>ACIEEM</p> <p>Class 1 Bat Licence (NE)</p> <p>Class 1 Hazel Dormouse Licence (NE)</p> <p>Class 1 GCN Licence (NE)</p>	<p>Kane has over nine years' experience in ecological field survey and consultancy. As a Senior Ecologist with Ethos; Kane is responsible for leading and undertaking comprehensive habitat assessments protected species surveys and is a licenced bat, GCN and dormouse worker.</p>	<p>Project management and bat survey.</p>
<b>George Clutterbuck</b>	Senior BNG Consultant	<p>Level 2 Certificate and Diploma in Work-based Environmental Conservation</p> <p>Level 2 Certificate and Diploma in Work-based Environmental Conservation</p>	<p>George has over seven years' experience in ecological field survey and consultancy. George is responsible for undertaking comprehensive habitats and protected species assessments. Much of his time is spent digitising using GIS software to achieve Biodiversity Net Gain.</p>	<p>Bat survey.</p>
<b>Sarah Roberts</b>	Assistant Ecologist	<p>MSc, BA, Qualifying CIEEM</p> <p>Class licence WML-CL29 To survey for barn owl (<i>Tyto alba</i>)</p>	<p>Sarah has over three years' of consultancy and biodiversity project management experience. Sarah assists with fieldwork and report-writing for habitats and protected species. She specialises in ornithology and ecological provisions for urban developments.</p>	<p>Structures inspection and bat survey.</p>
<b>Kate Downes</b>	Assistant Ecologist	<p>MSc, BSc (Hons) Qualifying CIEEM</p>	<p>Kate is an assistant ecologist at Ethos with a special interest and relevant field survey experience in ornithology. Kate assists with fieldwork and report-writing for habitats and protected species.</p>	<p>Report author, structures inspection and bat survey.</p>

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## 4 BASELINE ECOLOGICAL CONDITIONS

### 4.1 Designated Sites

#### Statutory designated sites

4.1.1 There are two statutory designated sites present within 2km of the site, which are shown in Figure 3 below.

#### *Cwm Taf Fechan Woodlands*

4.1.2 Cwm Taf Fechan Woodlands is a Local Nature Reserve (LNR) and Site of Special Scientific Interest (SSSI) and is located 1.6km north-east of the development site. The site comprises an area of ancient, broadleaved woodland with the River Taf Fechan running through a steep valley of Carboniferous limestone and calcareous grasslands. The valley is one of the best recorded sites for bryophytes in Glamorgan.

4.1.3 Cwm Taf Fechan Woodlands (LNR/SSSI) is of County Importance for nature conservation, in line with its designation. There are no functional habitat links from the development site to the designated site and there is sufficient distance between them, therefore there are assessed to be no impacts on the LNR/SSSI. Cwm Fat Fechan Woodlands is not considered further in this assessment.

#### *Cwm Glo a Glyndyrys*

4.1.4 Cwm Glo a Glyndyrys is a Site of Special Scientific Interest (SSSI) and is located 1.4km south-west of the development site. The site comprises extensive areas of marshy grassland, species-rich neutral grassland and acid grassland. In particular, the site is of scientific interest for its diverse assemblage of grassland fungi, including 32 species of waxcap *Hygrocybe spp.*, making it one of the best sites in Britain.

4.1.5 Cwm Glo a Glyndyrys SSSI is of County Importance for nature conservation, in line with its designation. There are no functional habitat links from the site to the SSSI and the development site is a sufficient distance away from the SSSI, therefore there are assessed to be no impacts on the SSSI. The SSSI is not considered further in this assessment.

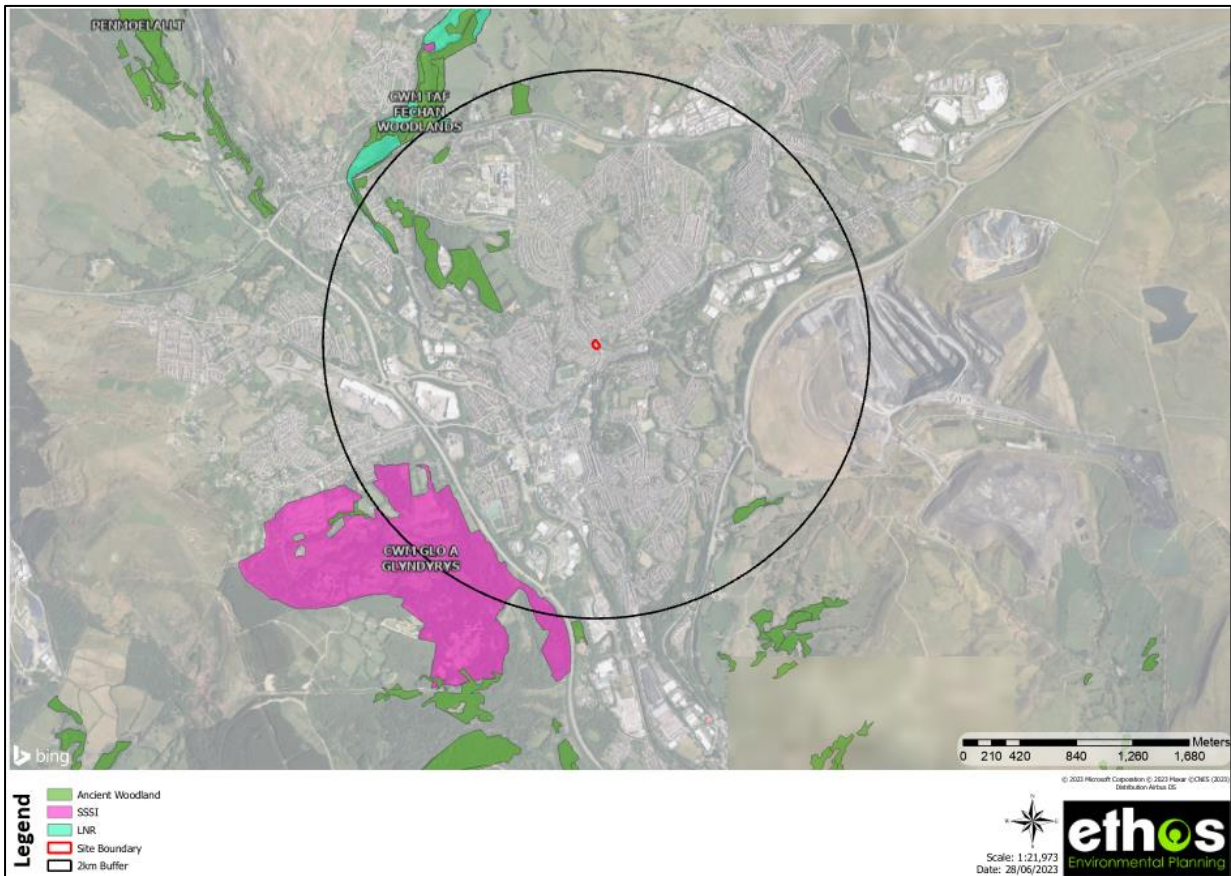


Figure 3 Statutory designated sites within 2km of the site

## 4.2 Habitats

### General site description

- 4.2.1 The site comprises a semi-derelict former general hospital, located immediately within a residential area, with three residential streets curving around the site boundary; Alexandra Road, Gwaelodygarth Road and the High Street. The wider area is built-up, with the site situated a short distance north from the town centre, in the middle of three major roads; the A465 to the north, the A4060 to the east and the A470 to the west.

## 4.3 Bats

### Habitats

- 4.3.1 The former hospital structure is set within an area of hardstanding with a low stone wall and wrought iron fencing. There is minimal vegetation present, with individual buddleia (*Buddleja davidii*) growing out from the roof in places and ivy (*Hedera helix*) present on parts of the external walls. Within the central courtyard and adjacent to the structure's northern and eastern elevations, overgrown areas of buddleia and bramble (*Rubus fruticosus*) are present and there is a small group of leylandii on the southern boundary. The habitats onsite offer very low potential foraging opportunities for bats, however residential gardens in the immediate area may offer additional limited foraging

opportunities for a range of bat species. There are no suitable features onsite for commuting bats to utilise. Overall, the site is assessed to have very low potential for foraging and commuting bats.

### Structures inspection

4.3.2 The survey area comprised one main structure (Figure 4) and is described in relation to its potential for bats below.



Figure 4 Assessment of structure's potential for bats

### Main structure

4.3.3 The former hospital comprises separate, rectangular wings, set around a central courtyard (Photos 1-8). It is a two-storey, brick-built structure, with decorative turret style projections and frontage features. The structure is sloped to the south-east, resulting in the ground floor level at the rear becoming the first-floor level at the front.

4.3.4 There are a series of roof structures which are pitched, timber framed and slated. Additionally, there are some flat roofed sections. The roof structures are present in varying heights and sizes with vents and skylights present. In some parts, the roof is still intact, however several areas on the southern, western and eastern elevations show missing slate tiles and areas where the roof voids are exposed due to roof collapse (Photos 9-13).



- 4.3.5 Several windows and doorways are open (Photo 4, 9 & 14-16), where timber security boarding has been partly or wholly removed. Overall, the structure shows signs of gaps around window frames and doors, as well as in the brickwork. **No evidence of bats** was identified during the structure inspection.
- 4.3.6 Given that the previous bat survey and structural inspection by Just Mammals Consultancy (2016) found no evidence of bats using the structure and reported that the building was already in advanced states of disrepair, the structure is assessed as having **low potential** for roosting bats.



*Photo 1 Front (south-eastern) elevation*



*Photo 2 Front (southern) elevation*



*Photo 3 Western elevation*



*Photo 4 Western elevation*





*Photo 5 Eastern elevation*



*Photo 6 Eastern elevation*



*Photo 7 Northern elevation*



*Photo 8 Northern elevation*



*Photo 9 Missing tiles on southern elevation*



*Photo 10 Missing tiles on western elevation*





*Photo 11 Missing tiles on eastern elevation*



*Photo 12 Missing tiles on eastern elevation*



*Photo 13 Missing tiles on eastern elevation*



*Photo 14 Open window on eastern elevation*



*Photo 15 Open window on eastern elevation*



*Photo 16 Open window on eastern elevation*

### Emergence survey

4.3.7 One emergence survey was carried out on the former hospital structure in line with guidance provided in 'Bat Surveys Good Practice Guidelines' (Collins, 2016). The detailed results of the emergence surveys are provided in Appendix 1 and a summary is provided below:

- From all four surveyor positions, no bats were seen emerging from the structure.

- Only one species of bat was recorded using the site; common pipistrelle (*Pipistrellus pipistrellus*). The species was recorded in very low numbers, with a maximum count of three individuals observed throughout the survey.

4.3.8 These observations were supported by the Echo Meter Touch (EMT) bat detector recordings obtained during the emergence survey to increase confidence.

#### Summary

4.3.9 There were no bats observed emerging from the surveyed structure and there was no evidence of bats identified during the structural inspection. The building is assessed to not currently support roosting bats however, easy access into the damaged roof structure may mean occasional day roosting could occur. To avoid impacts on bats which may arise if the structure becomes occupied prior to construction, mitigation during demolition will be required. Requirements are described further in Section 6 to safeguard bats during works.

## 4.4 Birds

4.4.1 The former hospital structure offers nesting opportunities for a wide range of bird species, in addition to vegetation onsite including more mature stands of buddleia, denser areas of bramble and Leylandii trees. These vegetative habitats also provide some limited opportunities for foraging birds.

4.4.2 Several species of bird were observed onsite during the May 2023 surveys, which are likely to be nesting. A robin (*Erithacus rubecula*) carrying food was observed entering a metal grate on the south-western corner of the building and a large flock of feral pigeon were seen entering and exiting via the collapsed roof on the southern elevation. Blackbirds (*Turdus merula*), house martin (*Delichon urbicum*) and swifts (*Apus apus*) were all also seen foraging around the structure, the latter two being Birds of Conservation Concern (BoCC) Red listed species.

4.4.3 Other birds recorded during the May 2023 visit also using the site, included swifts (*Apus apus*), a Birds of Conservation Concern (BoCC) Red listed species.

4.4.4 As the proposals are limited to the renovation of the building, impacts on the assemblage of birds present on site is not considered likely. Birds will be only discussed further in this assessment in relation to precautionary mitigation during construction, due to the limited impact on habitats within the red line boundary.

## 4.5 Summary

Table 1 Important ecological features

Important Ecological Features	Scale of Importance
Bats	Precautionary
Birds	Precautionary



## 5 DESCRIPTION OF THE PROPOSED DEVELOPMENT

- 5.1 The development proposals comprise the part-demolition of the existing structure, its renovation and overall creation of residential dwellings.
- 5.2 The layout of the development has been developed to minimise impacts on site ecology as follows:
- The construction footprint is limited to the existing building and hard standing, which is not of importance for nature conservation.



Figure 5 Development proposals



Figure 6 Proposed plan view of eastern elevation





Figure 7 Proposed plan view of western elevation

## **6 ASSESSMENT OF IMPACTS AND MITIGATION MEASURES**

### **6.1 Bats**

#### Construction impacts

6.1.1 The former hospital building was assessed as having low potential for roosting bats. Precautionary measures have been recommended to avoid impacts on potential roosting bats during construction, as detailed below:

- Pre-works check for bats by a licensed ecologist, who will identify the presence of bats.
- Soft demolition of suitable bat features on buildings, comprising potential slipped tiles, under the supervision and guidance of the licensed ecologist.

6.1.2 Overall, with the implementation of precautionary mitigation during construction, no significant effects are predicted on bats as a result of development.

### **6.2 Birds**

#### Construction impacts

6.2.1 The former hospital building was assessed as providing nesting opportunities for feral pigeon and robin. Precautionary measures will be required to avoid impacts on nesting birds during construction, as detailed below:

- Where possible, renovation works and any vegetation removal should take place outside of the breeding bird season (March to August inclusive).
- If this is not possible, the building should be subject to a pre-works check for nesting birds by a Suitably Qualified Ecologist (SQE), who will identify the presence of any active nests.
- The SQE will set up exclusion zones around the active nests, with no works being undertaken within the exclusion zone until the chicks have fledged.

6.2.2 Overall, with the implementation of precautionary mitigation during construction, no significant effects are predicted on birds as a result of development.

### **6.3 Summary**

6.3.1 A summary of the predicted significance of any effects, as well as the proposed mitigation/ compensation measures and how these may be secured are outlined in Table 2.

Table 2 Summary of significance of effects and mitigation/compensation

Ecological Feature	Mitigation	Mechanism for securing delivery	Residual Effects
Bats	<ul style="list-style-type: none"> <li>• Pre-works check by a licensed ecologist.</li> <li>• Soft demolition of suitable bat features under ecological supervision.</li> </ul>	Recommendations within this EclA subject to compliance condition.	N/A
Birds	<ul style="list-style-type: none"> <li>• Timing of renovation works and vegetation removal to avoid nesting bird season, or pre-works check by SQE.</li> </ul>	Recommendations within this EclA subject to compliance condition.	N/A

## 6.4 Cumulative Effects

6.4.1 As no likely significant effects have been identified as part of the works, it is predicted that there will also be no cumulative effects.

## **7 ENHANCEMENTS**

### **7.1 Protected Species**

7.1.1 The proposals could include several provisions for protected and notable species which are as follows:

- Four Schwegler bat tubes to be installed on a sunny and sheltered elevation, suitable for crevice-dwelling species such as pipistrelle bats, which were the only recorded species on site.
- Three swift bricks to be installed together on a sunny elevation, as this species was observed foraging on the site.

## **8 MONITORING**

- 8.1 The mitigation measures set out in Section 6 which will be supervised by the SQE and licensed ecologist will be recorded as a 'site note' and if required, made available to the LPA.
  
- 8.2 The provision of the ecological enhancements as set out in Section 7 will be subject to an ecological compliance report undertaken by the SQE.



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## 9 CONCLUSIONS

- 9.1 The structure inspection identified the former hospital to contain low potential for bats, with the subsequent emergence survey determining that the building does not currently support roosting bats. As the building could potentially be used as a roost prior to construction, due to the presence of bat features, mitigation for the construction phase has been recommended.
- 9.2 Mitigation measures for bats have been provided, which is focused on avoiding impacts during the demolition and construction phase of the development.
- 9.3 Mitigation measures for birds have been provided, which focus on avoiding impacts during the construction phase.
- 9.4 The mitigation and enhancement measures described could be secured by way of appropriately worded planning condition relating to compliance with the recommendations of this EclA. The proposed development is therefore in accordance with relevant national and local planning policies in relation to nature conservation and relevant wildlife legislation, as set out in Section 2.
- 9.5 The enhancement measures proposed will allow the proposed development to support Policy EnW1 Nature Conservation and Ecosystem Resilience of the Merthyr Tydfil County Borough Council adopted Replacement Local Development Plan, which relates to development proposals seeking to promote the resilience of ecosystems and enhance biodiversity interests.

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## APPENDIX 1 BAT SURVEY DATA

The following section details the results of the bat survey at the site. Codes used in the description of bat species are as follows:

CP - Common pipistrelle (*Pipistrellus pipitrellus*)

A summary of the bat emergence survey is included below, and the environmental variables recorded during the surveys are shown in Table 3.

Table 3 Emergence survey environmental variables

<b>Date</b>	<b>10/05/2023</b>	
<b>Sunset/Sunrise</b>	20:51	
Start / End time	20:36	22:21
Temperature (°C)	11	10
Humidity (%)	84	89
Cloud cover (oktas)	7/8	7/8
Avg. Wind speed (m/s)	3	3
Rain	During	

### Position one (P1)

No bats were recorded throughout the survey.

### Position two (P2)

21:30 - CP commuting south-west to north-east over the building.

No bats emerged from the structure. Activity was very quiet with no notable activity.

### Position three (P3)

21:14 – CP commuting over the structure towards position from the west.

No bats emerged from the structure. One bat recorded for the entire survey, which was a commuting CP.

### Position four (P4)

21:15 – CP pass heard not seen.

21:20 – CP pass heard not seen.

21:22 – CP pass heard not seen.

No bats emerged from the structure. Three instances of CP pass but heard and not seen. Very low activity.